

RECEIVED
SDNY PRO SE OFFICE
2021 DEC 29 AM 10:21

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RECEIVED
2021 DEC 28 PM 8:07
U.S. DISTRICT COURT SDNY

DAVID MKRTCHYAN

Write the full name of each plaintiff.

CV
(Include case number if one has been assigned)

-against-

CITY OF New York

John Doe 1, John Doe 2

COMPLAINT

Do you want a jury trial?

☒ Yes ☐ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ Federal Question

☐ Diversity of Citizenship

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

§ 42, U.S.C. 1982

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, _____, is a citizen of the State of _____
(Plaintiff's name)

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of _____

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, _____, is a citizen of the State of
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or
subject of the foreign state of _____.

If the defendant is a corporation:

The defendant, _____, is incorporated under the laws of
the State of _____

and has its principal place of business in the State of _____

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____.

If more than one defendant is named in the complaint, attach additional pages providing
information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional
pages if needed.

DAVID		MRKRTCHYAN
First Name	Middle Initial	Last Name
3435 74 th Street, Apt. 2B, JACKSON Heights		
Street Address		
NEW YORK	NY	11372
County, City	State	Zip Code
646-753-3618	seklge@yahoo.com	
Telephone Number	Email Address (if available)	

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:	<div style="display: flex; justify-content: space-between; border-bottom: 1px solid black; padding-bottom: 2px;"> John Doe 1 </div> <div style="display: flex; justify-content: space-between; border-bottom: 1px solid black; padding-bottom: 2px;"> First Name Last Name </div> <div style="border-bottom: 1px solid black; padding-bottom: 2px;"> NYPD Police Officer, TAX# 965003 </div> <div style="border-bottom: 1px solid black; padding-bottom: 2px;"> Current Job Title (or other identifying information) </div> <div style="border-bottom: 1px solid black; padding-bottom: 2px;"> NYPD </div> <div style="border-bottom: 1px solid black; padding-bottom: 2px;"> Current Work Address (or other address where defendant may be served) </div> <div style="display: flex; justify-content: space-between; border-bottom: 1px solid black; padding-bottom: 2px;"> New York NY </div> <div style="display: flex; justify-content: space-between; border-bottom: 1px solid black; padding-bottom: 2px;"> County, City State Zip Code </div>
Defendant 2:	<div style="display: flex; justify-content: space-between; border-bottom: 1px solid black; padding-bottom: 2px;"> John Doe 2 </div> <div style="display: flex; justify-content: space-between; border-bottom: 1px solid black; padding-bottom: 2px;"> First Name Last Name </div> <div style="border-bottom: 1px solid black; padding-bottom: 2px;"> NYPD LEUTENANT </div> <div style="border-bottom: 1px solid black; padding-bottom: 2px;"> Current Job Title (or other identifying information) </div> <div style="border-bottom: 1px solid black; padding-bottom: 2px;"> NYPD </div> <div style="border-bottom: 1px solid black; padding-bottom: 2px;"> Current Work Address (or other address where defendant may be served) </div> <div style="display: flex; justify-content: space-between; border-bottom: 1px solid black; padding-bottom: 2px;"> New York NY </div> <div style="display: flex; justify-content: space-between; border-bottom: 1px solid black; padding-bottom: 2px;"> County, City State Zip Code </div>
Defendant 3:	<div style="display: flex; justify-content: space-between; border-bottom: 1px solid black; padding-bottom: 2px;"> </div> <div style="display: flex; justify-content: space-between; border-bottom: 1px solid black; padding-bottom: 2px;"> First Name Last Name </div> <div style="border-bottom: 1px solid black; padding-bottom: 2px;"> </div> <div style="border-bottom: 1px solid black; padding-bottom: 2px;"> Current Job Title (or other identifying information) </div> <div style="border-bottom: 1px solid black; padding-bottom: 2px;"> </div> <div style="border-bottom: 1px solid black; padding-bottom: 2px;"> Current Work Address (or other address where defendant may be served) </div> <div style="display: flex; justify-content: space-between; border-bottom: 1px solid black; padding-bottom: 2px;"> </div> <div style="display: flex; justify-content: space-between; border-bottom: 1px solid black; padding-bottom: 2px;"> County, City State Zip Code </div>

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

III. STATEMENT OF CLAIMPlace(s) of occurrence: West 50th Street at the Rockefeller Center.Date(s) of occurrence: December 29, 2018**FACTS:**

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

1. PLAINTIFF as a PHOTOGRAPHER FOR HIRE
advertised PHOTOS using HAND-HELD PLACARD
at the CURBSIDE OF THE pedestrian sidewalk.
2. DEFENDANTS STATED THAT THE ACTION OF
PLAINTIFF WAS ILLEGAL.
3. DEFENDANTS THREATENED TO ARREST
PLAINTIFF, AND ISSUED him TWO
CRIMINAL COURT APPEARANCE TICKETS,
later both dismissed.

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

CAUSES OF ACTION and claims.

1. VIOLATION PLAINTIFF'S First Amendment Rights.
2. MALICIOUS PROSECUTION.
3. FAILURE TO TRAIN.
4. INTENTIONAL INFLECTION OF AN EMOTIONAL DISTRESS.

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

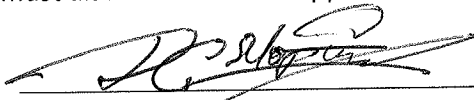
1. Injunction ORDER, and other reliefs COURT finds just and proper.
2. MONEY DAMAGES in the amount of \$50,000, or to be determined at the JURY TRIAL.

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

<u>December 28, 2021</u>			
Dated		Plaintiff's Signature	
<u>DAVIT</u>		<u>MRKRTCHYAN</u>	
First Name	Middle Initial	Last Name	
<u>3435 74th Street, Apt. 2B, JACKSON Hights,</u>			
Street Address			
<u>NEW YORK</u>		<u>NY</u>	<u>11372</u>
County, City		State	Zip Code
<u>646-753-3618</u>		<u>serlge@yahoo.com</u>	
Telephone Number		Email Address (if available)	

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.



**PRIORITY
MAIL
EXPRESS®**

RECEIVED
2021 DEC 28 PM 8:07
U.S. DISTRICT COURT SDNY

FROM: DAVIT MKRTCHYAN
3435 74th Street, Apt. 2B
JACKSON HEIGHTS,
NEW YORK, NY, 11372



FLAT RATE ENVELOPE

ONE RATE ■ ANY WEIGHT

To schedule free Package Pickup,
scan the QR code.



USPS.COM/PICKUP

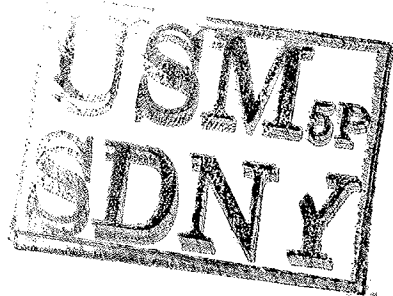
VISIT US AT USPS.COM®
ORDER FREE SUPPLIES ONLINE



PS10001000006

EP13F May 2020
OD: 12 1/2 x 9 1/2

To: PRO SE
Clerk's Office
FEDERAL COURT (SDNY)



RECEIVED
SDNY PRO SE OFFICE
2021 DEC 29 AM 10:26

GUARANTEED* ■ TRACKED ■ INSURED